

IN THE UNITED STATES DISTRICT COURT
FOR THE WYOMING DISTRICT COURT

CRAIG CUNNINGHAM,

Plaintiff,

v.

TECHNOLOGIC USA, INC., et al

Defendant,

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

NOV 15 2022
1:15 PM
Margaret Botkins, Clerk
Cheyenne

CASE NO: 19-CV-00231-NDF

DAVINDER SINGH, VIRTUAL TELECOM,
INC., DAVIS TELECOM, INC., TECH
DIRECT, LLC, SUMCO PANAMA USA, MOBI
TELECOM, LLC, GEIST TELECOM, LLC,
FUGLE TELECOM, LLC, CALL PIPE, LLC,
(WY individuals and companies)

Garnishees,

MOTION FOR CONTINUING WRIT OF GARNISHMENT AND
APPOINTMENT OF SPECIAL PROCESS SERVER:

To The Honorable US District Court:

Pursuant to Wyoming Law and the Federal Rules of Civil Procedure, Plaintiff / Judgment Creditor Craig Cunningham moves this court to issue a Continuing Writ of Garnishment against Davinder Singh, Virtual Telecom, Inc., Davis Telecom, Inc., Tech Direct, LLC, Sumco Panama USA, Mobi Telecom, LLC, Geist Telecom, LLC, Fugle Telecom LLC and Call Pipe, LLC, as Garnishees.

Davinder Singh has mailing address at 520 N Sun Dr. Casper, WY 82609.

Virtual Telecom, Inc. is a Wyoming corporation with mailing address of 1621 Central Avenue, Cheyenne, WY 82001.

Davis Telecom, Inc. is a Wyoming corporation with mailing address of 1621 Central Avenue, Cheyenne, WY 82001.

Tech Direct, LLC is a Wyoming corporation with mailing address of 1095 Sugar View Dr. Ste. 100 Sheridan, WY 82801.

Sumco Panama USA is a Wyoming corporation with mailing address of 1095 Sugar View Dr. Ste. 100 Sheridan, WY 82801.

Mobi Telecom, LLC is a Wyoming corporation with mailing address of 1095 Sugar View Dr. Ste. 100 Sheridan, WY 82801.

Geist Telecom, LLC is a Wyoming corporation with mailing address of 1095 Sugar View Dr. Ste. 100 Sheridan, WY 82801.

Fugle telecom, LLC is a Wyoming corporation with mailing address of 1095 Sugar View Dr. Ste. 100 Sheridan, WY 82801.

Call Pipe, LLC is a Wyoming corporation with mailing address of 30 N Gould St. Ste. R Sheridan, WY 82801.

Judgment Creditor Craig Cunningham requests permission to use a special process server to include a process server or County Sheriff to serve this Writ of Garnishment because the US Marshals are incompetent, unprofessional, untimely, and difficult to deal with compared to sheriffs and process servers who can serve documents in behalf of the court.

Judgment Creditor Craig Cunningham states that Judgment was entered against Defendant Technologic USA, Inc. in the amount of \$396,000.00 on June 18, 2020, which is on file with the court. Judgment Creditor does not believe that Defendant has in Defendant's possession visible property upon which a levy can be made sufficient to satisfy the judgment.

To the Garnishee: you are commanded to serve an answer to this writ on Craig Cunningham, (phone: 615-348-1977, e-mail: judgmentcollectionteam@protonmail.com) within 20 days of service on the garnishee, exclusive of the day of service, and to file the original with the clerk of court either before service on the judgment creditor or immediately thereafter.

The answer shall state whether Garnishee is indebted to Defendant Technologic USA, Inc. at the time of the Answer or was indebted at the time of service of the writ, plus sufficient time not to exceed 1 business day for the garnishee to act expeditiously on the writ or at any time between such times, and in what sum and what tangible and intangible personal property of the Defendant Garnishee is in possession or control of at the time of the answer or had at the time of service of this writ, or at any time between such times, and whether the Garnishee knows of any

other person indebted to Defendant or who may be in the possession or control of any property of Defendant.

Therefore, Judgment Creditor motions the United States District Court for the District of Wyoming for issuance of a Writ of Garnishment against the above-named Garnishees in the amount of \$396,000.00.

Submitted to the United States District Court for the District of Wyoming on October 22, 2022.



Craig Cunningham

Dated: October 22, 2022

Plaintiff / Judgment Creditor

3000 Custer Road, Suite 270-206

Plano, TX 75075

615-348-1977

judgmentcollectionteam@protonmail.com

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CRAIG CUNNINGHAM,

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CASE NO: 19-CV-00231-NDF

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PANAMA USA, MOBI TELECOM, LLC,
GEIST TELECOM, LLC, FUGLE
TELECOM, LLC, CALL PIPE, LLC,
(WY individuals and companies)

Garnishees,

Plaintiff's Affidavit in Support

My name is Craig Cunningham, and I am the Plaintiff and the Judgment Creditor in this case. I am making this affidavit in support of my motion for a Continuing Writ of Garnishment. I have never been convicted of a felony or crime of moral turpitude. I am over the age of 18.

I have personal knowledge of the facts stated in this affidavit and they are true and correct. I am authorized to make this affidavit.

The Plaintiff was assigned the Judgment against Technologic USA, Inc., which is on file in the court. This judgment is valid and subsisting and a supersedeas bond has not been approved and filed to suspend execution of the judgment. The judgment is for amount of \$346,000.00, with the total to not exceed the amount admitted or found to be due debtor from garnishee, unless Garnishee fails to answer.

Upon information and belief the above-named Garnishees have property belonging to

Technologic USA, Inc..

I declare under the penalty of perjury that the foregoing is true and correct. Executed on 10/22/2022.



Craig Cunningham

Plaintiff / Judgment Creditor
3000 Custer Road, Suite 270-206
Plano, TX 75075
615-348-1977
judgmentcollectionteam@protonmail.com

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TELECOM, LLC, CALL PIPE, LLC,

(WY individuals and companies)

Garnishees,

Plaintiff's Certificate of Service

I hereby certify a true copy of the foregoing was mailed to the parties in this case.



Craig Cunningham

Plaintiff / Judgment Creditor
3000 Custer Road, Suite 270-206
Plano, TX 75075
615-348-1977
judgmentcollectionteam@protonmail.com

Craig Cunningham
3000 Custer Rd. Ste. 210-206
Plano, TX 75075



United States District Court
2120 Capitol Ave
Room 2131
Cheyenne, WY 82001-3658